

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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CURTIS DARBY,

Plaintiff,

-against-

NEW YORK CITY POLICE DEPARTMENT; POLICE
OFFICER OMAR ELSAYED; POLICE OFFICER MATTHEW
FLORES,

**NOTICE OF MOTION FOR
THE IMPOSITION OF
SANCTIONS AGAINST
PLAINTIFF**

14-CV-4183 (JG) (VPP)

Defendants.
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PLEASE TAKE NOTICE that, upon the annexed Declaration of Alexander Noble in Support of Defendant's Motion For the Imposition of Sanctions Against Plaintiff, dated September 18, 2015, and Memorandum of Law of the same date, defendants Police Officer Omar Elsayed and Police Officer Matthew Flores, before the Honorable John Gleeson at the United States Courthouse for the Eastern District of New York located at 225 Cadman Plaza East, Brooklyn, New York, for an Order dismissing the Amended Complaint as a sanction against plaintiff for engaging in abusive litigation practices, together with such further and other relief as this Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that, in accordance with the Court's August 21, 2015 Order, opposition papers, if any, are due on or before October 19, 2015, and reply papers, if any, are due on or before November 2, 2015.

Dated: New York, New York
September 18, 2015

ZACHARY W. CARTER
Corporation Counsel for the
City of New York
*Attorney for Defendants NYPD, Elsayed,
and Flores*
100 Church Street, Room 3-310
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By: /s/ Alexander Noble
ALEXANDER NOBLE
Assistant Corporation Counsel
Special Federal Litigation Division

To: Curtis Darby (by Mail)
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Staten Island, NY 10301

Docket No. 14 CV 4078 (JG) (VPP)

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

CURTIS DARBY,

Plaintiff,

-against-

NEW YORK CITY POLICE DEPARTMENT;
POLICE OFFICER OMAR ELSAYED; POLICE
OFFICER MATTHEW FLORES

Defendants.

**NOTICE OF MOTION
AND
DECLARATION OF ALEXANDER NOBLE
IN SUPPORT OF
DEFENDANTS' MOTION FOR THE
IMPOSITION OF SANCTIONS AGAINST
PLAINTIFF**

ZACHARY W. CARTER

*Corporation Counsel of the City of New York
Attorney for Defendants New York City Police
Department, Police Officer Elsayed, and Police
Officer Flores
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New York, N.Y. 10007*

*Of Counsel: Alexander Noble
Tel: (212) 356-2357
NYCLIS No. 2014-027634*

Due and timely service is hereby admitted.

New York, N.Y., 2015

..... Esq.

Attorney for